

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
) CRIMINAL NO. 04-10384-PBS
v.)
)
DANIEL KAMEN,)
 Defendant.)
)

**GOVERNMENT'S RESPONSE TO DEFENDANT'S MOTION
FOR RECONSIDERATION**

The United States of America, by and through its attorneys, United States Attorney Michael J. Sullivan and Assistant United States Attorney Paul R. Moore, hereby files this Response to Defendant's Motion for Reconsideration.¹

Mr. Kamen now files a Motion for Reconsideration of this Court's Order, issued June 20, 2006. In the supporting Memorandum, Mr. Kamen raises no new issues but rather re-states the issues and concludes that by not ruling in his favor, the Court had not properly considered the issues presented quite thoroughly at the Hearing in this matter and in the parties' filings.

The government believes that the Court's rather lengthy Order was particularly well-written and thoroughly considered the matters before the Court from varying viewpoints and with important guidance from quite recent case law. There are no matters raised by Mr. Kamen in his latest filing which were not already thoroughly and properly addressed by this Court in its ruling.

The government, therefore, suggests to the Court that no further consideration of the Motion to Suppress is either justified or warranted.

¹Filed on July 10, 2006.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Paul R. Moore
Paul R. Moore
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on July 17, 2006.

/s/ Paul R. Moore
Paul R. Moore
Assistant U.S. Attorney

July 17, 2006